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Sent: Tuesday, July 28, 2020 12:26 PM
To: Jason Gehring
Cc: Skwierawski, M. Andrew; Mueller, Gregory E.
Subject: Somers House Litigation

Hi Jason,

I hope you're doing well. I briefly mentioned after the last deposition our need for further moving the discovery deadline. The last text-only order set the dispositive motion deadline as August 3 and discovery cutoff as August 31. Are you willing to stipulate to move these deadlines back—I'd say at least 30 days for summary judgment and 45 for discovery.

Obviously the pandemic affected all parties' ability to expeditiously conduct discovery; that coupled with my recent takeover of this file has led to some delays in scheduling depositions. Let me know your thoughts and I can draft something up (or you can).

Also, I'm looking to depose Mr. Davison and Mr. Kitzman the week of August 17—I'm available any day but will likely need at least 4 hours with each. I'm speaking with my team concerning additional fact witnesses and will get back to you for those to be scheduled after mid-August.

Ryan



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Exhibit A
